

# **EXHIBIT B38**

12/28/2018

about the standards - IFRA International Fragrance Association - in every sense

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about the standards

The IFRA Standards form the basis for the globally accepted and recognized risk management system for the safe use of fragrance ingredients and are part of the IFRA Code of Practice. This is the self-regulating system of the industry, based on risk assessments carried out by an Independent Expert Panel.

The Expert Panel is made up of renowned independent experts from the fields such as dermatology, toxicology, pathology and environmental sciences. Their role is to evaluate the data on a fragrance ingredient to see if it supports the current use level, to make sure that there is no risk for the consumer. In cases where the safety assessment does not support the current use, the Panel instructs IFRA to issue a Standard either restricting or banning a material.

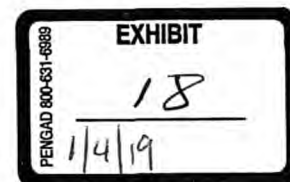
The Standards amount to 186 substances which have been either banned or restricted in their use in fragrance products. All members of IFRA are required, as a condition of membership, to observe the IFRA Code of Practice. The fragrance industry spends approximately \$8 million (annually) in joint research on the safety of fragrances, and much more at the individual company level.

IFRA provides information on the exposure situation (usage concentration, variety of use, volume of use), chemical composition as well as the olfactory profile and olfactory potential (importance) of a fragrance ingredient to the Research Institute for Fragrance Materials (RIFM). RIFM is the fragrance industry's scientific centre, preparing comprehensive dossiers on the materials including all available safety data. If necessary, RIFM initiates and organizes any missing safety studies on the fragrance ingredient.

The Standards are established according to the following process:

1. IFRA provides information on the exposure situation (usage concentration, variety of use, volume of use), chemical composition as well as the olfactory profile and olfactory potential (importance) of a fragrance ingredient to RIFM;
2. RIFM prepares a comprehensive dossier on the material including all available safety data and, if necessary, initiates and organizes any missing safety studies on the fragrance ingredient;
3. The RIFM Panel of independent experts, evaluates the data to see if it supports the current use level, to make sure that there is no risk/danger for the consumer; if the safety assessment does not support the current use, the Panel instructs IFRA to issue a Standard\*;
4. IFRA prepares a Standard in accordance with the Panel's instructions and conclusions;
5. The draft Standard is consulted with the IFRA membership and stakeholders for a period of about a month, to ensure that IFRA/RIFM are aware of all data on the material and to provide holders of additional data that might alter the outcome of the Panel's risk assessment with the opportunity to share those with IFRA/RIFM;
6. If no additional information is received via the Consultation phase, the final Standard is published in a notification procedure as part of an "Amendment to the IFRA Code of Practice".

\* The final decision on the content of the Standard is solely in the hands of the Expert Panel, not IFRA or RIFM.



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